

Consultation Response from KC Highways		
2019/90155 Former Harrisons Electrical Warehouse, Huddersfield Road, Dewsbury, WF13 2RU		
Change of Use and alterations to convert trade counter retail unit to function room		
Date Responded: 09/12/19	Responding Officer: CNB	Responding Ref: K15-2NW/40
POST DEFERRAL FURTHER INFORMATION RESPONSE This response is based on further information submitted by the applicant after a meeting at Kirklees planning offices on 4/11/19 and after the application was deferred at committee for further information relating to highways issues and should be read in conjunction with the previous highways responses, amended below. These comments refer to Technical Note 4: Highways and Parking/Event Management Plan by VIA Solutions and drawing No 1816203a Proposed Car Park Layout. The initial highways concern was that the impact of the proposals on the operation of the local highway network and highway safety could not be assessed as there were no trip generation figures provided with the application to indicate the vehicular demand that the development would create. There are no trip generation figures for this type of land use on the national TRICS database, the industry standard for trip generation figures, probably due to the difficulty of obtaining an accurate figure and the reluctance of existing sites to allow interviews of arriving guests for a number of reasons (this is also the same for drive-thru coffee shops so this isn't an isolated occurrence). Due to this difficulty, the applicant was unable to provide observed local trip generation figures and so an alternative method was employed, described as being from "first principles". This was a calculation that attempted to estimate the demand by using the car ownership levels from Dewsbury (69%) and an estimate of 3 guests per vehicle (as observed at other venues). This method provided a demand figure of 46 which would have a residual figure of 12 vehicles looking to find on street parking. These figures are not unreasonable but may be based on giving a slightly better figure than would be expected. If Kirklees car ownership figures are used this increases to 73.6% which would increase the demand to 49 vehicles with a residual demand of 15 vehicles. It has to be noted that two important assumptions have to be made to achieve these figures; • That all non-car owning guests will travel by public transport, the 3 guests per vehicle figure is only applied to the car owning population (ie after the 31% of non-car owners have been removed). It may be more reasonable to assume that some of the non-car owning guests may travel as passengers with the car-owning guests. This would increase the realistic demand figure to somewhere between the 46 figure and 67 (200 guests/3). This latter figure may put pressure on the available off-site parking within the immediate area. • That the maximum number of guests is limited to 200. It was not indicated how this would be achieved, monitored or made legally binding. As these figures are an estimate based on assumptions rather than being based on observed averages there may be fluctuations and the actual parking demand may be above these figures and on occasion may lead to parking and obstruction issues. To counter this the applicant has offered to fund any traffic management issues that may arise within the first three years after the first event. No further details of this offer were made, such as possible mitigation measures or any financial limits to this mitigation and so further details may need to be provided before this can be accepted or this can be added as a condition?		

Drawing No 1816203a Proposed Car Park Layout shows a dedicated drop off point and this is acceptable as it still allows access to the allocated car park spaces. A swept path shows that a “stretch limo” type vehicle can also access the site safely.

The Parking/Event Management Plan (PEMP) proposes having a reserved parking system in operation within the car park. This would provide 34 parking passes for event organisers to hand out to guests, indicating they had a reserved space, while other guests would be advised to find alternative methods of transport or parking. There were no details of how the enforcement process would be operated. However, details of this could be requested as a pre-use condition. Technical Note 4 and the PEMP both suggest that these will be issued to the first 34 vehicles with the others being told to use alternative parking. We would prefer that this was re-worded to allow for the permits to be pre-assigned by the organisers and all other guests told to find alternative parking.

The parking of coaches in a nearby business (Martech on Thornhill Road) was suggested in the technical note and PEMP but no further details were provided. This parking site is approximately 800m from the proposal site. The use of a mini-bus to ferry coach passengers from this site to the venue was suggested, further details can be added to the PEMP as part of the condition and a legal agreement to allow this to happen for the lifetime of the development will need to be made.

None of these details covers any staff parking and this should be discouraged at times when there is an event on. This should be added to the PEMP. We would recommend that the applicant/operators contact the West Yorkshire Combined Authority Travel Plan Network (TPN) as these may be able to provide advice on staff travel. Details of the TPN should be added as a footnote.

The PEMP again mentions mitigation for parking/safety issues and again doesn’t provide any details or limitations. It is accepted that any specific traffic issues will need identifying before mitigation can be suggested but some framework of suggestions or limitations should be included, along with suggested trigger points and a method to guarantee the funding of mitigation.

With the venue limited to a maximum of 200 guests we would consider that the proposals will now limit the impacts on the local highway network and road safety to levels we could accept although we would like to see the following conditions added.

Conditions

Prior to the first use of the venue, details are to be submitted for written approval indicating the procedures for monitoring for three years post first use of the venue and the limitations in mitigation that can be applied to any highways and safety issues identified during these three years.

The development shall not be brought into use until a Car Park/Event Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Car Park Management Plan shall include details of:

- i. Resident Liaison member of staff and contact details
- ii. Method(s) of informing residents of events taking place where high volumes of guests are expected. (for example this might include leaflet, text, website, notice board etc).

iii. Information for guests on travel options and booking system for parking spaces.

iv. Car park attendant/s

v. The overflow parking plan and monitoring of issues caused by overflow parking including limitations to mitigation for issues arising due to overflow parking.

vi. Mechanism for review of the Car Park Management Plan

The development shall thereafter be operated in accordance with the approved Car Park Management Plan.

Reason: This is a pre-commencement condition to ensure the site can be made safe and accessible and in the interests of highway safety, to ensure pedestrian safety and in the interests of residential amenity.

Footnotes

Contact details for the Travel Plan Network, West Yorkshire Combined Authority, Leeds City Region Enterprise Partnership (LEP), City Exchange Level 2 West, 11 Albion Street, Leeds, LS1 2ES. Website address <https://www.the-lep.com/for-businesses/travel-plan-network/>

FINAL RESPONSE – sent 1/10/19

This response is based on further information submitted by the applicant in the form of Technical Note 3: Highways. This response should be read in conjunction with the Interim Response forwarded to Highways on 23/7/19.

This application is for the change of use and alterations to convert a trade counter (electrical goods) to a function room (wedding centre/banqueting suite) in an existing industrial building with a small car park and access from A638 Huddersfield Road/Pinfold Hill. The application was accompanied with a Transport Assessment dated January 2019 produced by VIA Solutions and subsequent submissions of “Plan as Proposed drawing” (No 18-144-11A), “Site Plan as Proposed drawing” (18-144-10A), both by Code 6 Architecture, Technical Note 1: Highways, Technical Note 2: Highways and Technical Note 3: Highways from VIA Solutions.

There have been changes to the application and additional information submitted since the initial comments were provided.

Access

The previous belief that use of the access from Central Street was unavailable has now been reversed and access from Central Street is available. This now allows the site to be safely accessed by an 8.6m stretch limousine as demonstrated by the swept path analysis drawing 1816203.

The increase in width of the existing Pinfold Hill access is acceptable, with the pedestrian access separated from the vehicular access for road safety reasons. We would like to see a similar separation between vehicles and pedestrians at the northern Central Street access, however due to layout constraints this may be difficult and so some procedure to limit vehicular access may be required.

The access on A644 Huddersfield Road/Pinfold Hill would be a left in/left out only arrangement due to A644 being a dual carriageway with no access to the westbound lanes. Due to this access to the site from the east would be limited and would necessitate the use of Wormald Street, central Street and Pinfold Hill.

Trip Generation

There were no trip generation details provided with the initial application and there are no examples of this type of proposal contained within the national TRICS database, the industry standard database for development trip generation.

Technical Note 3: Highways suggested that the capacity of the venue would be 400 people, however its suggestion that there would be less visitors on a Friday was not backed up with any evidence and the frequency of events at other venues will have no bearing on the possible frequency of events at the proposal site.

Car parking demand analysis based on local 2011 Census car ownership levels is acceptable as is the assumption that typical car occupancy would be 3 to 4 persons per vehicle. The applicants own calculations using these levels and assumptions show that the car park would be short by approximately 58 spaces. This would cause the displacement of these 58 vehicles back on to the local highway network looking for suitable parking.

It is well known that at above 90% capacity the efficiency of a car park reduces as vehicles look for spaces and this can cause queuing that may back out on to the highway causing delay and possible highway safety issues.

It should be noted that the trip generation figures submitted in Technical Note 3: Highways are based on a high occupancy of vehicles and also already include a number of non-car trips suggested at approximately 31% of guests and therefore these figures cannot be used as a worst case scenario.

Parking

Technical Note 3: Highways lays out the applicant's justification for the number of parking spaces to be proposed.

Snapshot parking observations were carried out on Friday 7th June and an unidentified Saturday in July and were provided in Technical Note 3. These show that there were spaces at that time on certain car parks in the town centre and that there was more on street parking on Central Street during the week than at weekends. None of these parking spaces can be guaranteed as being free at the time of requirement.

It should also be noted that there are no simple or desirable routes to the proposal site from these car parks due to access restrictions caused by the location of the railway and the town centre ring road. The route along A644 Huddersfield Road is also unattractive under the railway where the footway is very narrow. There are pedestrian crossing facilities across the A638 Dewsbury Ring Road at the junction with A644 Webster Hill.

The parking snapshots were displayed on Figure 1A and Figure 2 of Technical Note 3: Highways.

The on street parking shown on the plan on Wellington Road is a mixture of pay and display and disabled badge holders only and the parking shown on Nelson Street and South Street is also pay and display.

The car park coloured yellow on the plan is immediately adjacent to a similar wedding venue development and is often full when this wedding venue is in operation. This parking has the likelihood to overflow to the green and blue coloured car parks.

The car parks coloured pink and green are the main railway station car park and may be heavily used with rail commuter parking during the week and shoppers travelling to Leeds at the weekend. However we also consider this car park, the orange coloured car park on Wellington Road East, the red coloured car park on South Street and the on street parking on Wellington Road East are too detached from the proposal site as to be attractive to guests at over 500m walk from the venue (400m for South Street).

The proposed town centre paid car parking will not be as desirable to guests as free on-street parking close to the proposal site.

There is limited uncontrolled on-street parking to the north of the site on Wormald Street and Central Street, however this parking is shared with competing users and cannot always be guaranteed available.

Technical Note 3: Highways indicated that during the Friday snapshot period there were 13 vehicles parked on Wormald Street and 9 vehicles parked on Central Street with 2 vehicles on Wormald Street and 1 vehicle on Central Street on the Saturday.

No details were provided on the total number of vehicles that can be accommodated on these streets. Observations indicate there is on street space for 15 vehicles on Wormald Street and 9 vehicles on Central Street. There is also space for 14 vehicles on Vulcan Road and 9 vehicles on Vulcan Close and 9 spaces on High Street but these spaces were not covered by Technical Note 3: Highways. These spaces are shared by competing users and most of them may be unavailable on weekdays. It should also be noted that at weekends there may be competing use for these spaces from Dewsbury Evangelical church and the Mosque on High Street.

There have been previous complaints received by the Kirklees Highway safety team concerning parking issues on these streets and also parking and obstruction issues, damage only collisions and vehicles failing to obey the one way system on Pinfold Hill. These have been detailed in previous highway's responses and we wouldn't like to see any development in the area that may exacerbate these concerns. None of the Technical Notes have suitably considered this issue.

It is considered that without the provision of adequate off street parking, the proposals will cause on street parking and congestion/obstruction issues on the local highway network as observed occurring at similar developments in the local area.

Coach Drop Off

Technical Note 3: Highways does not resolve the concerns raised over coach/mini-bus drop off locations. It would be unreasonable to condition limits on the times and dates that coach/mini-bus travel can be used as this would go against the sustainable travel responsibilities of the development.

There is a suggestion in the Technical Note that they could use a section of Central Street adjacent to the northern entrance as a drop off point. Again, as with parking, this space cannot be guaranteed as being free for the drop off and pick up by coaches and mini-buses as it is uncontrolled on street parking that is available for all competing users. If space on Central Street is not available it is likely that coaches/mini buses will drop off/pick up from other unsuitable locations such as Pinfold Hill and A644 Huddersfield Road, both of which would cause obstruction and safety issues. This has not been addressed by the applicant.

Conclusion

Highways Development Management still have a serious concern regarding the parking problems that are anticipated with the development proposals. We would not wish to see a situation arise where there is a

replication of parking and obstruction issues that have been reported at other similar venues both in Dewsbury and other locations within Kirklees. There is nothing in the application and subsequent Technical Notes that alleviate these concerns.

With this we object to this application on highway operational and safety grounds.

Further Plans/Information Response – sent 01/05/19

This response is based on further information submitted by the applicant in the form of Technical Note 2: Highways. This response should be read in conjunction with the Interim Response sent on 22/2/19.

This application is for the change of use and alterations to convert a trade counter (electrical goods) to a function room (wedding centre/banqueting suite) in an existing industrial building with a small car park and access from A638 Huddersfield Road/Pinfold Hill. The application was accompanied with a Transport Assessment dated January 2019 produced by VIA Solutions. And subsequent submissions of Plan as Proposed drawing (No 18-144-11A), Site Plan as Proposed drawing (18-144-10A), both by Code 6 Architecture, Technical Note 1: Highways and Technical Note 2: Highways from VIA Solutions.

There have been changes to the application and additional information submitted since the initial comments were provided.

The use of the access to Central Street by customers has been denied by the land owner and this may require gates are fitted to close off this access leaving a single point of access off A638 Huddersfield Road/Webster Hill.

At the point of access A638 is a main distributor dual carriageway allowing for one way movements only (left in/left out). Adjacent to this access is the junction with Pinfold Hill, this is also a narrow (approximately 4m width) and steep one way residential road acting as a sliproad for the A683 with a sharp blind bend part way up. The A638 has No Waiting at Any Time TROs and turns to a Clearway just to the east of the access junction, it also requires yellow keep clear hatched markings at the site access/Pinfold Hill junction due to traffic queues from the signalised junction with Dewsbury Ring Road. Both roads are 30mph and have footways and street lighting present. The A683 carries a high frequency bus route with stops approximately 330m to the west, although there is no safe pedestrian route to the westbound stop.

Behind the application site is Central Street, a 30mph two way single carriageway local distributor road of approximately 6.75m width and with footways on both sides and street lighting present. There are No Waiting at Any Time TRO restrictions, Keep Clear H bars across accesses and a bus stop marking. There are approximately 24 on street parking spaces available on Central Street in the vicinity of the proposal site and these appear to be frequently fully parked up, the presence of H bars suggest there may be an oversubscription of the parking spaces leading to parking issues at some time in the past. The road hosts a medium frequency bus route with stops approximately 150m from the building entrance, however there is no direct pedestrian route between them and the proposal site due to restrictions of access through the industrial estate yard adjacent to the site.

Consultation with the Kirklees Road Safety Team has indicated that there are existing parking issues in the area around the site resulting in the Police being required on several occasions due to drivers blocking Pinfold Hill. There have been complaints concerning parking on the TRO restriction markings at the junction of Boothroyd Lane and Pinfold Hill and double parking on Central Street causing obstruction and access issues. There have

been police concerns regarding the number of damage only collisions on Pinfold Hill/Webster Hill and the Kirklees road safety team have been asked to investigate this matter.

They also indicated that the number of collisions presented in the application is incorrect. A quick search of the accident stats held on Key Accident shows that there were 7 collisions registered around the site in the previous 5 years, two on Central Street/Boothroyd Lane and four on the eastbound carriageway of A638 Huddersfield Road/Webster Hill between the site access and the signalised junction. The additional collisions didn't reveal any patterns.

The application is to change a former electrical services trade counter and warehouse into a banqueting centre of approximately 550sqm of public dining floor area over two levels using a mezzanine floor above the main floor (measurements scaled from drawing 18-144-11). The application proposes 34 parking spaces to the front of the building with access from A683.

Trip Generation

No trip generation information was provided with the application other than the assumption that the 34 parking spaces would produce only 68 two way trips from the site. This takes no account of the unfulfilled demand generated by the application site or vehicles/taxis dropping off guests. Trip generation for a development of this type cannot just be based on the number of car parking spaces that fit on the car park and it is more reasonable that parking solutions should be based on the expected demand for the development without falling down the simple predict and provide route.

Unfortunately there are no comparable sites available on the TRICs database from which to generate a suitable trip rate and a request to survey a similar local banqueting suite to obtain trip rates was not carried out. Technical Note 1 suggested that the site should be assessed as a community centre (rather than the suggested restaurant), but these sites tend to give lower trip rates than would be expected for the type of venue requested in the application. Technical Note 2 suggested that the maximum number of diners will be 400. When this figure is applied to a TRICS modal split for the peak hour for community centres the modal split was;

Mode	Percentage	People Trips
Single Vehicle Occupants	27.6%	110
Multi Vehicle Occupants	25.9%	104
Pedestrians	37.9%	152
Public Transport	8.6%	34

Given the generous assumption that multi occupancy cars will have 4 occupants per vehicle this would indicate a worst case trip demand of 136 cars for 400 diners. This would produce an additional parking demand of approximately 100 cars more than the car park can service. It is acknowledged that these figures will be a worst case as the number of solo guests at weddings is usually lower than the percentage shown and that there would be some guests making use of taxis (which may be included in the multi-occupation vehicles) which would not require a long term parking space.

Access

The access to the site is now to be just from A638 Huddersfield Road/Pinfold Hill. These are both have one way movement at the junction, with Pinfold Hill heading downhill towards the access and A638 heading towards Dewsbury town centre. This would restrict the direction that vehicles could arrive from and, more so, depart to.

There was a concern from the Kirklees Highway Safety team that exiting vehicles may turn the wrong way up Pinfold Hill against the formal one way thus exacerbating the existing problem of drivers making this illegal move. Technical Note 2 addressed this concern with the addition of “No Right Turn” signs at the exit, with the venue management monitoring the situation to see if further signs and markings are required. This monitoring can be included in a car parking management plan that should be conditioned.

Technical Note 1 suggests that the access is to be widened to 7.2m allow for safe two way vehicular movements and pedestrian access. The current drawings 1816201a and 1816202 as submitted with Technical Note 2 show the vehicle access at 6m and no pedestrian access. The swept path for a 6.33m mini-bus shows possible conflict points with the gate posts either side of the access and so the widening to 7.2m may be advantageous.

Pedestrian access becomes increasingly important as the number of pedestrian users increase and the above modal split shows that there may be a greater number of pedestrians (including pt users and car drivers forced to park away from the site due to limited on-site parking spaces) than vehicles using the access and the pedestrian facilities should represent this.

A separate pedestrian access should also be shown to the paved pedestrian link across the car park. Ideally this paved footway should be 2m wide and not 1m wide as shown and should have a kerb or bollards to the edge against the vehicle parking spaces to stop vehicles mounting the footway for safety reasons.

A swept path analysis for a 6.33m mini-bus was submitted showing that this size of vehicle can enter, manoeuvre and exit the site safely in forward gear, however if two vehicles of this size are entering/exiting at the same time there may be possible conflict with the access at 6m wide.

The 6.33m mini bus is the longest vehicle able to negotiate the constraints of the car park and so a “stretch limo” style vehicle, more common with modern/non-traditional weddings, will not be able to gain access and debussing on Huddersfield Road is to be discouraged due to potential safety and highway operational issues. Technical Note 2 suggests that this type of vehicle would drop off passengers on Central Street, leaving them to walk to the pedestrian access off Pinfold Hill.

Parking

The 10 staff cycle parking spaces are now indicated on drawing 18-144-10A and are in a secure and overlooked position.

Staff parking at the site is to be at the operational minimum, this is acceptable as the site is in a reasonably sustainable edge of town centre location and the staff parking can be directly controlled by the operators of the premises. This should be included as part of the car parking management plan.

The proposal that a number of visitors will arrive by coach is beneficial to the parking issue, however the coach drop off/parking location suggested in Technical Note 2 is on Central Street and there is already a high demand for parking along this road which is likely to be exacerbated by other car borne guests looking for parking

spaces when the on-site car park is full. It was suggested that the coaches could debus passengers from the double yellow line TRO areas on Central Street, but this is not to be recommended as the no waiting at any time (NWAAT) markings to the south side of Central Street are there to protect visibility at junctions. Without the clear visibility splays there could be road safety implications, especially with the increased volumes of vehicles expected to be seeking on street parking in this area during an event. The NWAAT restrictions to the north side of Central Street are to keep a clear passage along the highway as a vehicle, especially a bus/coach, stopping on the double yellows, opposite a legally parked vehicle, would cause an obstruction of the highway.

A638 Huddersfield Road outside the site is not suitable for a coach drop off for safety and operational reasons.

The parking standards quoted in the Transport Statement are based on those for public halls, community centres and Places of Worship (1 space per 25sqm) but we do not feel that this level of parking provision would be fit for purpose or would reflect the actual use of the venue.

The trip rate calculations given above suggest that the parking demand may be in the region of 130 vehicles, excluding coaches, and the parking provided by the application is only 34 spaces there would be an on street demand for approximately 100 spaces

Given that there are approximately 24 on street spaces available within the immediate area that are shared between all local users and residents, this may lead to parking issues. There is evidence of existing on street parking issues being reported to the council in this area and this development would only exacerbate these existing issues unless the parking is robustly addressed. Car parking spaces in the residential areas to the north of the site are at a premium and any increase in overflow parking would lead to issues and complaints from residents while any illegal parking on restricted lengths may cause obstruction issues and highway safety issues.

Technical Note 2 provides a map and list of public car parks and on street parking that are located within 600m walking distance of the application site (although it must be noted that most of them are pay and display car parks). These could provide the overflow parking required to satisfy demand, however there would also be demand for these parking spaces from other users within the town centre and the railway station. A survey was taken of the car parks to show that spaces were available on a Friday afternoon, however this does not allow for any additional shopper demand that would occur on a Saturday or any demand from events at the Orchid wedding venue that is adjacent to the car parks. It is unlikely that there would be sufficient available spaces if both venues were having events on a busy shopping Saturday.

The Orchid site, although having significantly fewer private parking spaces than the proposal site, is located immediately adjacent to a 292 space public pay and display car park with a direct link between the venue and the car park. Even with the additional parking availability this site has still resulted in parking issues being reported to the council with observations being made of illegal parking on the footpath and road despite being in contravention of a Clearway order and on grassed areas and other locations blocking access. It is not unreasonable to assume that similar uncontrolled parking would also occur at the proposal site, where there are already recorded instances of parking and obstruction issues that have required police involvement.

The applicant has not been able to satisfactorily demonstrate what the trip generation and thus parking demand for this type and size of development will be or that it can be managed without exacerbating the existing parking and traffic issues in the immediate area. A parking management plan was mentioned within Technical Note 2 and would be welcomed if it could adequately manage the parking demand, but no further details of the plan were submitted. This would need to be strongly worded with direct actions included rather than just suggestions and some level of mitigation included if the parking management plan fails and there are complaints received regarding parking and obstruction issues in relation to functions at the venue.

Servicing

Refuse/recycling bin storage is to be within the loading/service bay of the building and collection is to be made while the venue is closed. There is sufficient space in the empty car park to allow a refuse vehicle to enter, turn and exit the site in forward gear, deliveries are expected to be made in a similar fashion and this is deemed acceptable.

With the above issues and concerns the Highways Development team cannot currently support this application on lack of information, highway safety and highway operation grounds. Technical note 2 has not alleviated all of the concerns.

In order to enable us to overcome our objection the applicant will need to provide sufficient information to overcome the concerns around parking provision, off site parking, pedestrian access and associated highway safety issues for this site.

FINAL RESPONSE (1) sent 01/05/19

This application is for the change of use and alterations to convert a trade counter (electrical goods) to a function room (wedding centre/banqueting suite) in an existing industrial building with a small car park and access from A638 Huddersfield Road/Pinfold Hill. The application was accompanied with a Transport Assessment dated January 2019 produced by VIA Solutions. And subsequent submissions of Plan as Proposed drawing (No 18-144-11A), Site Plan as Proposed drawing (18-144-10A), both by Code 6 Architecture, and Technical Note 1: Highways from VIA Solutions.

There have been changes to the application and additional information submitted since the initial comments were provided.

The use of the access to Central Street by customers has been denied by the land owner and this may require gates are fitted to close off this access.

There are two points of access for the existing site one from A638 Huddersfield Road/Webster Hill and one from Central Street, via an industrial estate access. The revised information suggested that only an improved access from A638 will now be used due to restrictions associated with the Central Street access.

At the point of access A638 is a main distributor dual carriageway allowing for one way movements only (left in/left out). Adjacent to this access is the junction with Pinfold Hill, this is also a narrow (approximately 4m width) and steep one way residential road acting as a sliproad for the A683 with a sharp blind bend part way up. The A638 has No Waiting at Any Time TROs and turns to a Clearway just to the east of the access junction, it also requires yellow keep clear hatched markings at the site access/Pinfold Hill junction due to traffic queues from the signalised junction with Dewsbury Ring Road. Both roads are 30mph and have footways and street lighting present. The A683 carries a high frequency bus route with stops approximately 330m to the west, although there is no safe pedestrian route to the westbound stop.

Behind the application site is Central Street, a 30mph two way single carriageway local distributor road of approximately 6.75m width and with footways on both sides and street lighting present. There are No Waiting at Any Time TRO restrictions, Keep Clear H bars across accesses and a bus stop marking. There are

approximately 24 on street parking spaces available on Central Street in the vicinity of the proposal site and these appear to be frequently fully parked up, the presence of H bars suggest there may be an oversubscription of the parking spaces leading to parking issues at some time in the past. The road hosts a medium frequency bus route with stops approximately 150m from the building entrance, however there is no direct pedestrian route between them and the proposal site due to restrictions of access through the industrial estate yard adjacent to the site.

Consultation with the Kirklees Road Safety Team has indicated that there are existing parking issues in the area around the site resulting in the Police being required on several occasions due to drivers blocking Pinfold Hill. There have been complaints concerning parking on the TRO restriction markings at the junction of Boothroyd Lane and Pinfold Hill and double parking on Central Street causing obstruction and access issues. There have been police concerns regarding the number of damage only collisions on Pinfold Hill/Webster Hill and the Kirklees road safety team have been asked to investigate this matter.

They also indicated that the number of collisions presented in the application is incorrect. A quick search of the accident stats held on Key Accident shows that there were 7 collisions registered around the site in the previous 5 years, two on Central Street/Boothroyd Lane and four on the eastbound carriageway of A638 Huddersfield Road/Webster Hill between the site access and the signalised junction. The additional collisions didn't reveal any patterns.

The application is to change a former electrical services trade counter and warehouse into a banqueting centre of approximately 550sqm of public dining floor area over two levels using a mezzanine floor above the main floor (measurements scaled from drawing 18-144-11). The application proposes 34 parking spaces to the front of the building with access from A683.

Trip Generation

No trip generation information was provided with the application other than the fundamentally flawed assumption that the 34 parking spaces would produce only 68 two way trips from the site. This indicates the trips likely from a 34 space car park and takes no account of the unfulfilled demand generated by the application site or vehicles/taxis dropping off guests. Trip generation for a development of this type cannot just be based on the number of car parking spaces that fit on the car park and it is more reasonable that parking solutions should be based on the expected demand for the development without falling down the simple predict and provide route. Unfortunately there are no comparable sites available on the TRICs database from which to generate a suitable trip rate and so we requested that the applicant identifies a similar local banqueting suite and carries out a full multi modal trip generation survey, this was not provided. The size of the proposal site is approximately half of that of a nearby banqueting/wedding centre (named as Orchid in the Technical Note 1) and this site advertises that it can take up to 900 diners, so it would not be unreasonable to assume that the application site would be able to accommodate upwards of 400 diners.

Access

The access to the site is now to be just from A638 Huddersfield Road/Pinfold Hill. These are both have one way movement at the junction, with Pinfold Hill heading downhill towards the access and A638 heading towards Dewsbury town centre. This would restrict the direction that vehicles could arrive from and, more so, depart to. There is a concern from the Kirklees Highway Safety team that exiting vehicles may turn the wrong way up

Pinfold Hill against the formal one way restriction in order to reach destinations to the west or find local car parking if the car park is full. There is an existing problem with vehicles going the wrong way up Pinfold Hill and they would want to avoid an increase in drivers making this illegal move especially as there is a blind bend on Pinfold Hill.

The access is to be widened to allow for safe two way vehicular movements and pedestrian access. The pedestrian access should be.

A swept path analysis for both mini-buses and a limousine was submitted and these show that this size of vehicle can enter, manoeuvre and exit the site safely in forward gear. This is acceptable, however it should be noted that the limousine was a standard type rather than the “stretch limo” style vehicle that is more common with modern/non-traditional weddings. One of these longer vehicles may not be able to access the venue and would need to debus its occupants at the kerb side on Huddersfield Road. This should be discouraged as it may cause an obstruction to traffic on this busy arterial route.

Parking

The 10 staff cycle parking spaces are now indicated on drawing 18-144-10A and are in a secure and overlooked position.

Staff parking at the site is to be at the operational minimum, this is acceptable as the site is in a reasonably sustainable edge of town centre location and the staff parking can be directly controlled by the operators of the premises.

The proposal that a number of visitors will arrive by coach is beneficial to the parking issue, however since permission to use the industrial park access from Central Street hasn't been given, the proposed coach parking area has been removed. No alternative coach drop off or parking location has been suggested. Huddersfield Road outside the site is not suitable for a coach drop off.

The parking standards quoted in the Transport Statement are based on those for public halls, community centres and Places of Worship (1 space per 25sqm) but we do not feel that this level of parking provision would be fit for purpose.

Given that the nearby “Orchid” wedding venue offers approximately 1.5sqm public floor space per diner, it is not unreasonable to assume a car of 4 would take 6sqm of floor space which would require approximately 92 parking spaces. Given a generous 30% discount for guests using public transport, this would still require approximately 65 parking spaces. This is still a shortfall of 31 spaces. Given that there are approximately 24 on street spaces available within the immediate area that are shared between all local users and residents, this may lead to parking issues. There is evidence of existing on street parking issues being reported to the council in this area and this development would only exacerbate these existing issues unless the parking is robustly addressed. Car parking spaces in the residential areas to the north of the site are at a premium and any increase in overflow parking would lead to issues and complaints from residents while any illegal parking on restricted lengths may cause obstruction issues and highway safety issues.

The “Orchard” site, although having significantly fewer private parking spaces, is located immediately adjacent to a 292 space public pay and display car park with a direct link between the venue and the car park. Even with the additional parking availability this site has still resulted in parking issues being reported to the council with observations being made of illegal parking on the footpath and road despite being in contravention of a

Clearway order and on grassed areas and other locations blocking access. It is not unreasonable to assume that similar uncontrolled parking would also occur at the proposal site, where there are already recorded instances of parking and obstruction issues that have required police involvement.

The applicant has not been able to satisfactorily demonstrate what the trip generation and thus parking demand for this type and size of development will be or that it can be managed without exacerbating the existing parking and traffic issues in the immediate area.

Servicing

Refuse/recycling bin storage is to be within the loading/service bay of the building and collection is to be made while the venue is closed. There is sufficient space in the empty car park to allow a refuse vehicle to enter, turn and exit the site in forward gear, deliveries are expected to be made in a similar fashion and this is deemed acceptable.

With the above issues and concerns the Highways Development team cannot currently support this application on lack of information, highway safety and highway operation grounds.

In order to enable us to overcome our objection the applicant will need to provide sufficient information to overcome the concerns around parking provision, off site parking and highway safety for this site.

INTERIM RESPONSE – sent 20/02/19

This application is for the change of use and alterations to convert a trade counter (electrical goods) to a function room (wedding centre/banqueting suite) in an existing industrial building with a small car park with two points of access. The application was accompanied with a Transport Assessment dated January 2019 and produced by VIA Solutions. Details within paragraph 1.1.1 of the TS suggest that it was prepared for an outline planning application and not the full application as submitted. The parking layout drawing is numbered 18-144-10 Site Plan as Proposed, however the Transport Statement contains drawing No 7824/1 which shows a similar layout but with directional arrows and four “reserved” parking spaces adjacent to the entrance of the building. It should be stated which drawing takes precedence.

There are two points of access for the existing site one from A638 Huddersfield Road/Webster Hill and one from Central Street, via an industrial estate access, neither of which have a safe segregated pedestrian access. The access from Huddersfield Road shows a paved pedestrian route, however it is blocked at the highway end by a low retaining wall and at the venue end with a low brick wall. The route from Central Street is shared with the access to several industrial units where deliveries and loading may take place at the arrival times of events.

At the point of access A638 is a main distributor dual carriageway allowing for one way movements only (left in/left out). Adjacent to this access is the junction with Pinfold Hill, this is also a narrow (approximately 4m width) and steep one way road acting as a sliproad on to A683. The A638 has No Waiting at Any Time TROs and turns to a Clearway just to the east of the access junction, it also requires yellow keep clear hatched markings

at the site access/Pinfold Hill junction due to traffic queues from the signalised junction with Dewsbury Ring Road. Both roads are 30mph and have footways and street lighting present. The A683 carries a high frequency bus route with stops approximately 330m to the west, although there is no safe pedestrian route to the westbound stop.

Central Street is a 30mph two way single carriageway local distributor road of approximately 6.75m width and with footways on both sides and street lighting present. There are No Waiting at Any Time TRO restrictions, Keep Clear H bars across accesses and a bus stop marking. There are approximately 24 on street parking spaces available on Central Street in the vicinity of the proposal site and these appear to be frequently fully parked up, the presence of H bars suggest there may be an oversubscription of parking spaces leading to parking issues at some time in the past. The road hosts a medium frequency bus route with stops approximately 150m from the building entrance, however the pedestrian route to them is through an industrial estate yard and access without pedestrian segregation.

Consultation with the Kirklees Road Safety Team has indicated that there are existing parking issues in the area around the site resulting in the Police being required on several occasions due to drivers blocking Pinfold Hill. There have been complaints concerning parking on the TRO restriction markings at the junction of Boothroyd Lane and Pinfold Hill and double parking on Central Street causing obstruction and access issues. There have been police concerns regarding the number of damage only collisions on Pinfold Hill/Webster Hill and the Kirklees road safety team have been asked to investigate this matter.

They also indicated that the number of collisions presented in the application is incorrect. A quick search of the accident stats held on Key Accident shows that there were 7 collisions registered around the site in the previous 5 years, two on Central Street/Boothroyd Lane and four on the eastbound carriageway of A638 Huddersfield Road/Webster Hill between the site access and the signalised junction. The additional collisions didn't reveal any patterns.

The application is to change a former electrical services trade counter and warehouse into a banqueting centre of approximately 550sqm of public dining floor area over two levels using a mezzanine floor above the main floor (measurements scaled from drawing 18-144-11). The application proposes 34 parking spaces to the front of the building, coach parking on a shared access road to the rear of the building and the implementation of a one way system through the car park using the Central Street access as an entrance and the A683 access as an exit.

Trip Generation

No trip generation information was provided with the application other than the fundamentally flawed assumption that the 34 parking spaces would produce only 68 two way trips from the site. This takes no account of the unfulfilled demand generated by the application site. Trip generation for a development of this type cannot just be based on the number of car parking spaces proposed for it and it is more reasonable that parking solutions should be based on the expected demand for the development without falling down the simple predict and provide route. Unfortunately there are no comparable sites available on the TRICs database from which to generate a suitable trip rate and so we would request that the applicant identifies a similar local banqueting suite and carries out a full multi modal trip generation survey when the premises is having an event with an average or higher than average attendance (this should be carried out to full TRICs survey standards if possible). This should take account of all arrivals to the site including cars parking both on site and on public

streets around the site, public transport, foot, bicycle, taxi etc. This should also include staff. Prior to carrying out a survey the applicant should send full details to the council for approval.

This type of development has the capacity to generate considerable numbers of trips, some local sites of a not too dissimilar size advertise that they can accommodate up to 900 diners in a single sitting and there is evidence of reported parking issues related to these sites. We would like to see information relating to the proposed number of covers provided to guide trip generation and parking provision figures.

Figures obtained from a similar, close by planning approval (12/92865) indicate that the floor space offered per diner is approximately 1.5sqm. Given a scaled area of approximately 550sqm for this proposal, this would allow for approximately 366 diners. Calculated from parking standards, 34 spaces would be suitable for 140sqm of public dining space which allows for approximately 93 diners. This is considerably less than the 366 that could be accommodated.

Access

It should be noted that Drawing 18-144-10 Site Plan as Proposed shows the access with Huddersfield Road marked up as a two way access, this goes against the proposals for a one way system made in the Transport Statement. This is repeated on drawing 7824/1 which also contains a confusing series of directional arrow markings that may cause confusion with drivers looking for an empty parking space.

There are no details of signs and line marking to be employed to promote the one way system through the car park. Details of these should be included in the submission.

Concerns have been raised by Kirklees highway safety team about the proposed internal one way system through the site as it is not enforceable. They fear that the single way nature of Huddersfield Road at the exit may cause drivers wishing to head in the opposite direction towards Ravensthorpe or Huddersfield to ignore the through site one way system and exit via the Central Street access. They would also wish to avoid an increase in drivers ignoring the formal one way system on Pinfold Hill by drivers turning right at the exit to avoid going in to Dewsbury town centre on the A683, especially as there is a blind bend on Pinfold Hill.

Access through to the car park from the Central Street access looks achievable for a standard car, however we would like to see a swept path analysis producing for both mini-buses and “stretch Limo” style vehicles to ensure they can safely access, navigate and exit the site.

Parking

The parking standards quoted in the Transport Statement are based on those for public halls, community centres and Places of Worship (1 space per 25sqm) but we do not feel that this level of parking provision would be fit for purpose. We feel that it is more realistic to treat this type of development as a restaurant (1 space per 4sqm) as that is what the proposals essentially are, albeit without a full kitchen. With restaurant parking standards, the proposed public dining floor space would equate to a requirement of 138 parking spaces and this level of parking provision does not appear to be deliverable in this location. There is evidence of existing on street parking issues being reported to the council in this area and this development would only exacerbate these existing issues unless the parking is robustly addressed. Car parking spaces in the residential areas to the north of the site are at a premium and any increase in overflow parking would lead to issues and complaints

from residents while any illegal parking on restricted lengths may cause obstruction issues and highway safety issues.

The parking does not address any drop-off spaces for people arriving via taxi or getting a lift. Neither does it appear to have any spaces that would be suitable for either mini-buses or “stretch-limo” style vehicles, without taking up multiple parking spaces which would then reduce the limited number of parking spaces.

The submitted Transport Statement indicated that there were to be 10 staff cycle parking spaces to be included with the development however the location of this cycle parking is not indicated on drawing 18-144-10. These should be in a safe and secure location that can easily be overseen for safety reasons. Ideally they should be sealed lockers giving some space for storage of helmets and other equipment and give some protection from the weather.

The proposal that a number of visitors will arrive by coach is beneficial to the parking issue, however the proposed coach parking location, the service road to the north of the site, could lead to the coaches blocking access not only to existing businesses on the industrial park and access to the adjacent church car park, but also to the proposed development itself. In order for this location to be taken seriously as a coach parking space, a swept path analysis showing that a coach can safely park up and still allow for full access to all other industrial units from the service road will need to be provided. This should allow for the full range of different industrial and goods vehicles that may be used by the surrounding industrial units. This would be required as the operational times of the proposal site overlap with those of the working day and Saturday mornings.

Staff parking at the site is to be at the operational minimum, this is acceptable as the site is in a reasonably sustainable edge of town centre location and the staff parking can be directly controlled by the operators of the premises.

The car park contains a small low retaining wall (shown on drawing 18/144/10 as broken blue lines), this appears to be removed to allow for additional parking spaces but no details of the re-grading of the car park has been submitted. A series of levels across the car park should be provided to show that suitable drainage is in place and that run-off won't go on to the adopted highway. Any changes in surfacing should be done using permeable materials and to national guidance.

Servicing

Servicing during hours when the site is closed is acceptable. No location for a refuse/recycling storage/collection area was provided with the application. This should be added to drawing 18-144-10 unless it is to be stored within the premises in which case this should be indicated. If it is to be stored on the car park then this should be in such a location that it does not obstruct any parking spaces, access to any parking spaces, the route through the car park or any turning/manoeuvring space within the car park.

With the above issues and concerns the Highways Development team cannot currently support this application on lack of information, highway safety and highway operation grounds.

In order to enable us to overcome our objection the applicant will need to provide sufficient information to overcome the concerns around parking provision, off site parking and highway safety for this site.